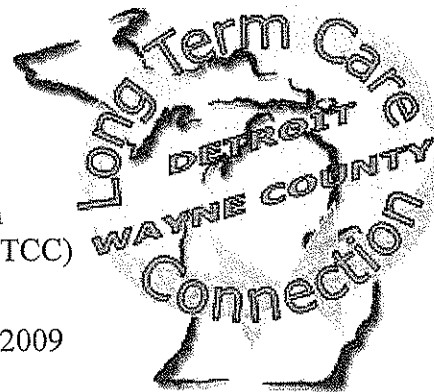


Earlene Traylor Neal
Executive Director

Willie Hampton
Chair, Governing Board

MSHDA 2007 ~2008 proposed Quality Allocation Plan
Detroit Wayne County Long Term Care Connection (DWCLTCC)
Comments

DWCLTCC Position and Concerns with MSHDA's 2008 ~ 2009
Draft QAP



Our Mission: To improve access and enhance consumer control by providing information and assistance to individuals needing either public or privately-funded services; professionals seeking assistance on behalf of their clients; and individuals planning for their future long-term care needs.

1333 Brewery Park Blvd.
Suite 160
Detroit, MI 48207-4544
(313) 567-5822
Fax (313) 392-0058

DWCLTCC formerly known as the Single Point of Entry (SPE). Our service area includes: Detroit; Highland Park; Hamtramck; Harper Woods; Grosse Pointe; Grosse Pointe Farms; Grosse Pointe Park; Grosse Pointe Shores; and Grosse Pointe Woods.

We appreciate the opportunity to express some of our concerns with the 2008 ~ 2009 Quality Allocation Plan (QAP) draft.

We are sure developers and those in the construction industry will and have expressed their concerns with the wage issues and increased production cost for affordable housing associated with the changes proposed in the QAP. We will forgo discussing that area during our time of expression.

What we would like to focus on is the hope that MSHDA would reconsider what appears to conflict with Governor Granholm's stated objectives to use public funds to improve Michigan's economy and the fact that the QAP seems to provide little or no funding to important urban initiatives like ALL of the Cities of Promise and the Affordable Assisted Living Initiative demonstration.

The Nursing Facility Transitional Services (NFTS) program is one of the vital programs administered within our agency. Locating affordable housing for the population we serve has been a constant challenge. Too often, when discussing the homeless, one segment of this distinguished group is left out; they are those residing in nursing facilities primarily because they have no other place to live within the community. It has long been our stand that MSHDA's definition of homelessness should comply with HUD's and be expanded to include nursing facility residents. We would encourage MSHDA to make such provisions clear in the QAP.

According to: Title 24.~ Housing and Urban Development; 24 C.F.R. § 291.405; Subchapter I. HUD Owned Properties; *Part 291. Disposition of Hud-Acquired Single Family Property (Refs & Annos); *Subpart E. Lease and Sale of Hud-Acquired Single Family Properties for the Homeless; § 291.405 Definitions.

Accordingly to HUD Homeless means:

- (1) Individuals or families who lack the resources to obtain housing, whose annual income is not in excess of 50 percent of the median income for the area, as determined by HUD, and who:
 - (i) Have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings;

To improve access and enhance consumer control by providing information and assistance to individuals needing either public or privately-funded services; professionals seeking assistance on behalf of their clients; and individuals planning for their future long-term care needs.

- (ii) Have a primary nighttime residence that is a supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing, but excluding prisons or other detention facilities); or
 - (iii) Are at imminent risk of homelessness because they face immediate eviction and have been unable to identify a subsequent residence, which would result in emergency shelter placement (except that persons facing eviction on the basis of criminal conduct such as drug trafficking and violations of handgun prohibitions shall not be considered homeless for purposes of this definition); or
- (2) Persons with disabilities who are about to be released from an institution and are at risk of imminent homelessness because no subsequent residences have been identified and because they lack the resources and support networks necessary to obtain access to housing.

This definition is current through August 16, 2007, 72 FR 45947

It is DWCLTCC's contention that the HUD definition of homelessness substantiates our position for inclusion of nursing facility residents as homeless, and we recommend the QAP offer support services and viable quality affordable housing options to them.

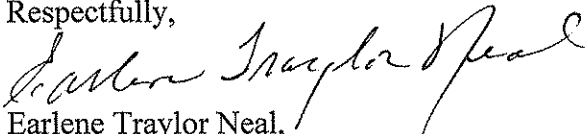
As we are aware, the Low Income Housing Tax Credit Program is one of the largest resources made available to Michigan it is designed to create new and/or renovated affordable housing for low-income people. However, typically very low-income individuals and families usually do not have enough income to afford most tax credit rents. We recommend consideration of enhancing the tax credit funding to include senior assisted living developments. Enhancement of the Medicaid Waiver and Section 8 voucher programs would also certainly make those communities more accessible to those who cannot afford housing and are relegated to live in nursing facilities. For the most part, the population we serve in the NFTS program are: very-low income; need support services; have poor credit history; and some have past felony records (dating back years ago), all of which creates barriers to residency for market rate properties and in some cases exclusion from traditional government subsidized affordable housing.

As noted by the Joint Center for Housing Studies of Harvard University, "Affordability problems remain the nation's fastest-growing and most pervasive housing challenge. Moreover, 2.1 million households live in severely inadequate housing while about three-quarters of a million people are homeless on any given night." According to the National Council of State Housing Agencies, "76 percent of all tax-credit projects in 2005 demanded some additional form of federal subsidy. Without this added assistance to fill the gap between what extremely low-income renters can pay and the rents needed to cover development cost, even successful programs like Low-Income Housing Tax Credits cannot adequately serve the poor."

As observed by the Michigan Housing Council, in a survey conducted by the National Housing Trust, in the past, "46 states including Michigan provide preservation incentives in their QAPs. Now MSHDA stands alone in its decision to eliminate preservation incentives from a QAP."

DWCLTCC takes the position that the QAP in its current draft form should not be approved/adopted by the MSHDA board and/or the Governor without weighing the expressed concerns of the solicited stakeholders, and a more acceptable plan can be constructed. We think and believe that we would agree the primary goal of the QAP is to provide quality affordable housing to low income individuals and families. To that end, we recommend using the current QAP until a more comparable one is approved. Thank you for your time and attention.

Respectfully,


Earlene Traylor Neal,
Executive Director